NIEHS should adopt the new non-animal test methods IMMEDIATELY. Government agencies should use in vitro cell culture tests to COMPLETELY REPLACE the use of animals in lethal dose tests. At a minimum, ALL government agencies that currently require the acute animal-poisoning studies should IMMEDIATELY incorporate the in vitro cell culture method as a transitional means of reducing the number of animals killed and should fully support the use of this method as an eventual REPLACEMENT for lethal-dose poisoning studies. In particular, the EPA must immediately incorporate the non-animal cell culture method into its HPV chemical program, as promised in its October 1999 agreement with the animal protection community.

Thank you, Ravi Grover